

Bonita  
Lavelle/EPR/R8/USEPA/US  
06/06/2008 04:18 PM

To robert.j.medler@grace.com  
cc clecours@mt.gov, <john.d.garr@mwhglobal.com>, Robert.R.Marriam@grace.com  
bcc  
Subject Important - Phase IIA

Dear Bob:

Section 5.2.1 of the Phase IIA Sampling and Analysis Plan (SAP) for OU3 of the Libby Asbestos Site specifies two rounds of sampling water from the Kootenai River in the vicinity of Rainy Creek. The first round was to be performed at approximately the time of maximum spring flow in Rainy Creek and the second event under summer baseflow conditions in Rainy Creek. Both events were to be performed in 2008.

Flow monitoring data from Rainy Creek collected as part of the Phase IIA program indicates that maximum flow in Rainy Creek during the spring of 2008 occurred sometime during the 2-week period May 19 - 26.

EPA understands that Remedium will need until June 23, 2008 to organize equipment and manpower and to perform reconnaissance of the Kootenai River necessary to perform the Kootenai River water sampling spring event as called for in the Phase IIA SAP.

By June 23, 2008 Rainy Creek will be past its maximum spring flow. Additionally, the Kootenai River flows will be high. This is not the condition that EPA is interested in characterizing and is not the condition described in the Phase IIA SAP. **Therefore, I am directing you to not perform the Kootenai River water sampling this spring.** EPA will revisit the need for sampling water from the Kootenai River at the time of maximum spring flow in Rainy Creek during the spring of 2009.

All other requirements of the Phase IIA SAP remain unchanged. Please note this includes the requirement to sample water from the Kootenai River under summer baseflow conditions in Rainy Creek.

Secondly, EPA considered the need to collect samples of surface water and sediment from the pond located near the Mill pond and downstream of sample location CC-2 that you mentioned in our conference call on June 5, 2008. We believe there are an adequate number of sampling locations in the vicinity of this pond (Mill pond, CC-2, LRC-1 and LRC-2) to meet the objectives of the Phase IIA program. **Therefore, EPA will not add sampling of this pond to the Phase IIA program.** There may be a need to characterize this pond to support a feasibility study or possibly remedial design in the future. If EPA determines this is necessary, the objectives and specific sampling requirements will be developed in a separate sampling and analysis plan.

If you have any questions about this direction, please don't hesitate to call me at (303)312-6579.

Sincerely,

Bonnie Lavelle  
Remedial Project Manager  
Libby Asbestos Superfund Site, OU3  
EPA Region 8  
1595 Wynkoop Street  
8EPR-SR  
Denver, CO 80202-1129

(303) 312-6579  
Fax (303) 312-7151